



January 26, 2016

File: 195112445

Mr. Roger Barham, Chairman
Fremont Planning Board
PO Box 120
295 Main Street
Fremont, NH 03044

Dear Mr. Barham:

**Reference: Galloway – Amended Excavation Site Plan
Tax Map 5 Lot 35
Fremont, NH**

We have reviewed the following information, submitted by Civil Construction Management, Inc. (CCM) for the subject project:

- Amended Site Plan, Sheets 1 through 2, prepared by CCM, dated October 2, 2015, most recently revised on October 2, 2015
- Previously approved Amended Site Plan, prepared by CCM, dated October 8, 2012, revised on January 22, 2013
- Groundwater Sampling Report prepared by Exeter Environmental Associates, Inc., dated October 23, 2013
- Fremont Planning Board Notice of Decision, recorded on February 7, 2013
- Minor Site Plan application, check list, and attachments dated October 5, 2015

This submittal was reviewed in response to a request by the Town of Fremont and was reviewed for conformance with the applicable sections of the Town of Fremont Site Plan Regulations as well as other relevant local and state regulations and accepted engineering practice. We have the following comments:

Project Description

According to the plans submitted by CCM, the applicant proposes to add a concrete and asphalt crushing/processing operation to the existing site plan, which currently includes an on-going excavation operation and the Seacoast Farms Compost Products composting operation. An additional office trailer is proposed, as well as the expansion of the northern excavation area.

Waiver Requests

1. We take no exception to the waiver request to not perform test pits, because no road or septic construction is proposed. However, if a drainage design is required by the Board, test pits may have to be performed to verify the estimated seasonal high water table and infiltration rates of the insitu soils.
2. Considering the proposed expansion of the existing use, we do not recommend that the Board grant the two waiver requests to not adhere to the access way and parking area design criteria. In addition, it should be noted that the existing site plan does not specify



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- any parking areas, nor are there any paved parking spaces on the site. Considering the existing and proposed use, a paved parking area would likely reduce the risk of contaminants leaching into the soils and water table.
3. With the condition that the Board approves the proposed office trailer, we would take no exception to the waiver request to not provide architectural renderings of the trailer.
 4. Considering the remote location of the site and the fact that the current operation has no landscaping, we take no exception to the waiver request to not provide a proposed landscaping plan as part of this application.
 5. We do not recommend that the Board grant the waiver request to not provide a Stormwater Drainage Analysis.
 6. Considering the proposed increase in trucking traffic, we do not recommend that the Board grant the waiver request to not provide a traffic analysis.

General Comments

7. It should be noted that a crushing/processing operation generates significant noise. The board should consider the proximity of the residential abutters when discussing the application. Considering this, specific attention should be given to the request to operate on Saturdays.
8. The current, operating site has no outdoor site lighting. We recommend the Planning Board discuss the lack of lighting, from a safety perspective, and if agreed, require that outdoor site lighting be proposed, per the Site Plan Regulations.
9. We recommend that an erosion and sediment control plan be submitted, demonstrating how the applicant intends to treat the large volume of stormwater that are directed into the adjacent wetland complex. Currently, there does not appear to be any erosion control/treatment measures in place.
10. During previous, annual site walks for the excavation activities and during our recent site walk on January 19, 2016, we noted that the active composting work area has encroached into the 100' wetland setback in many locations. As part of this approval, we recommend that the plans be revised to show these areas to be regraded and reclaimed. In addition, we recommend that permanent markers be placed every 50' delineating the setback, in an effort to eliminate future encroachment.
11. Considering the active work area far exceeds the 100,000 square foot limit, specified by NHDES Alteration of Terrain Program (AoT), we recommend that the applicant apply for an NHDES AoT permit.
12. We recommend that the applicant provide documentation demonstrating how the composting facility is complying with the maximum allowable 25 tons per day (trucked in compost) noted on the 2001 NHDES composting Permit By Notification (PBN) and how this correlates with the maximum 16 trucks per day allowed by the site plan, approved in 2013.



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13. The 2001 NHDES composting PBN identifies a minimum separation of 150' from any wetlands; however, the site plan shows that, at several locations, the active work area is located considerably less than 150' to the wetlands. We recommend that the Applicant address this inconsistency with the NHDES Waste Management Division and provide documentation that this issue is appropriately addressed.
14. We recommend that Item #4, of the previous conditions of approval, be clarified regarding the allowable 6,000 cubic yards of compost produced, so it is clear if this is a weekly, monthly, or annual, allowable total.
15. We recommend that the Town require surety, as noted in Item #5, of the previous conditions of approval, for the cost of disposal of the tailings that are currently located at the subject site.

Plan Comments

16. Typical notes must be added, addressing the missing items required in Section 1.13.S, items 1 through 19 of the Fremont Site Plan Regulations.
17. The benchmark that has been historically referenced to confirm that the excavation operation has maintained the required 4' separation to the seasonal high water table should be added to the plan.
18. The actual existing conditions of the site must be surveyed and shown on the plans. During our recent site walk, it appears that several of the fill/compost piles and the limits of the excavation operation are not accurately shown on the plans submitted.

Excavation Comments

19. Per RSA 155-E:4-a.VI a fence or other suitable barricade must be erected at the top of any cut slopes that exceed 1:1. During our recent site walk, several slopes were estimated to exceed the 1:1 limit and must be protected, as required.
20. The proposed excavation at the north of the site, along the Town ROW, must be revised to provide the required 50' setback to the Town ROW, per RSA 155-E:4-a.I.
21. The Board should review the current reclamation surety to confirm that it is adequate to cover the total cost of reclaiming all existing and proposed excavation areas.
22. We recommend that item #9, of the previous conditions of approval, dated January 22, 2013 be revised to omit the words "as available on-site", as it appears that there is not enough loam to adequately reclaim the current and proposed excavation area.
23. Because the proposed excavation at the north end of the site will be visible from the ROW, plantings must be proposed to screen the view of the excavation operation, per RSA 155-E:5.I.

Environmental Comments (Proposed Crushing/Processing Operations)

24. Notes should be added to the plans requiring that the facility operator shall hire a third party, environmental management consultant, who shall sample and test each and every



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- source of the concrete and construction material debris delivered to the facility, certifying that the material being imported has been analyzed, and the imported material contains no contamination and complies with all Local, State and Federal requirements and is suitable for reuse on a site other than the site the material was generated from.
25. Notes should be added to the plans requiring that a third party, environmental management consultant shall perform monthly inspections of the crushing facility and operation and shall collect samples of the materials being imported which shall be tested for the presents of contaminants.
 26. Notes should be added to the plans requiring that if crushing material sources are found to be unacceptable for the allowed use, the materials shall be removed from the site immediately and the Town notified within 24hrs.
 27. Notes should be added to the plans requiring that all reports by the third party environmental management consultant be filed with the Town within 48 hours of the completion of the report.
 28. Notes should be added to the plans requiring that the associated costs for the third party environmental management consultant, testing and reporting shall be borne by the construction debris crushing operation facility operator and/or owner.
 29. Considering the high pH levels associated with crushed concrete, the applicant should provide a plan, demonstrating how the potential wind-blown crushed concrete dust will be controlled, reducing or eliminating the potential contamination of the adjacent wetlands. In addition, the plan should show how the stormwater runoff with potentially elevated pH levels, from the crushed concrete stock piles will be controlled and treated, prior to entering the adjacent wetlands.

Drainage Analysis

30. Considering the large percentage (approximately 9-10 acres) of the parcel that has been cleared and developed over the past years, we recommend that the applicant provide a drainage analysis, complying with the Town's regulations and the requirements of the NHDES AoT Program, demonstrating how the sequential expansions of the active work area are to be mitigated, so the current increase in flow is reduced to pre-development conditions.

Traffic Analysis

31. We recommend that the applicant provide an estimated trip distribution analysis for the existing and proposed traffic entering and exiting the site. With this information, the Board will be able to determine if any off-site improvements will be appropriate and where they should occur.
32. As noted by the Road Agent, we concur that the intersection of Beede Hill Road and Shirkin Road does not appear to be adequate to handle the proposed, increased trucking. We recommend that a plan be provided showing the existing configuration of the



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intersection and the proposed improvements necessary to provide adequate sight distance, turning radii, etc.

33. The condition of Beede Hill Road between Shirkin Road and Route 101 appears poor. The additional, proposed heavy trucking will accelerate the deterioration of this roadway. We recommend that the Applicant provide an evaluation of Beede Hill Road to assist the Board in determining if off-site improvements are warranted and if so, the extent of the improvements necessary.
34. The gravel portion of Shirkin Road is shown to be 15' wide. Although the Applicant's existing business is the only facility on the dead-end road, 15' is not an adequate road width. The proposed increase in trucking on this road will potentially result in traffic delays on Beede Hill Road, for example, if trucks are waiting at the entrance of Shirkin Road due to another truck exiting the site. Furthermore, the additional trucking will result in additional maintenance/repairs to the gravel road, causing the Town to incur additional costs. We recommend that the gravel road be upgraded to meet the Town's typical roadway design requirements, specifically regarding the roadway width and the gravel/pavement section dimensions.
35. The Applicant is requesting that the current daily truck limit of 16 be increased to 40. The Applicant should provide a procedure to confirm with the Town, how the current limit of 16 trips and the proposed limit of 40 trucks will be documented by the applicant. As part of this proposed procedure, we recommend that reports be provided semi-annually to the Town.

Please call if you have any questions.

Sincerely,

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